

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

**JAPAN DISPLAY INC. and PANASONIC  
LIQUID CRYSTAL DISPLAY CO. LTD.**

**Plaintiffs,**

**v.**

**TIANMA MICROELECTRONICS CO.  
LTD.**

**Defendant**

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**JAPAN DISPLAY INC.**

**v.**

**TIANMA MICROELECTRONICS CO.  
LTD.**

**Defendant.**

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**JAPAN DISPLAY INC.,**

**v.**

**TIANMA MICROELECTRONICS CO.  
LTD.**

**Defendant.**

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§ **C.A. NO. 2:20-cv-00283-JRG**  
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§ **JURY TRIAL DEMANDED**  
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§ **C.A. NO. 2:20-cv-00284-JRG**  
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§ **JURY TRIAL DEMANDED**  
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§ **C.A. NO. 2:20-cv-00285-JRG**  
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§ **JURY TRIAL DEMANDED**  
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**UNOPPOSED MOTION TO EXTEND THE BRIEFING SCHEDULE FOR  
DEFENDANT'S MOTION TO DISMISS**

Plaintiffs Japan Display Inc. (“JDI”) and Panasonic Liquid Crystal Display Co., Ltd. (“PLD”) (collectively “Plaintiffs”) respectfully move the Court to extend by seven (7) days the briefing schedule for Defendant’s Rule 12(b)(2) Motion to Dismiss Plaintiffs’ Complaint For Lack of Personal Jurisdiction (“Motion”). All parties consent to the requested extension.

On January 4, 2021, the Court granted the parties' first request to extend the briefing schedule while Plaintiffs conducted jurisdictional discovery into the facts relevant to Defendant's Motion. Dkt. No. 25. The parties' agreement included depositions of the two individuals submitting declarations in support of Defendant's Motion. Dkt. No. 24. To date, Defendant has made one of the two declarants available for deposition – Mr. Shide Cheng (CEO of nonparty Tianma America, Inc.). Unfortunately, due to complications stemming from Covid-19 travel restrictions in China, Defendant has been unable to make the other witness – Mr. Yong Zhang (Vice Director of Defendant) – available as originally agreed. The parties have conferred extensively, and Defendant is in the process of rescheduling Mr. Zhang's deposition or identifying an appropriate alternative deponent. Plaintiffs request this extension to allow the Defendant sufficient time to set a new deposition date and for Plaintiffs to thereafter submit an opposition brief on a more complete record.

Plaintiffs respectfully request that the current briefing deadlines be extended for seven (7) days, so that Plaintiffs' opposition brief will due no later than February 19, 2021, and Defendant's reply brief will be due no later than February 26, 2021. Plaintiffs respectfully request that the Court grant this unopposed motion, as reflected in the proposed order submitted herewith.

Dated: February 3, 2021

Respectfully submitted,

/s/ Hilary L. Preston

Hilary L. Preston

Eric J. Klein

*Lead Attorney*

Texas State Bar No. 24041258

Jeffrey R. Swigart

Texas Bar No. 24102553

**VINSON & ELKINS L.L.P.**

2001 Ross Avenue, Suite 3900  
Dallas, TX 75201  
Telephone: (210) 220-7700  
Facsimile: (210) 220-7716  
Email: eklein@velaw.com  
Email: jswigart@velaw.com

Hilary L. Preston  
Texas State Bar No. 24062946  
Erik Shallman  
Texas State Bar No. 24113474  
Matthew J. Melancon  
Texas State Bar No. 24109544  
**VINSON & ELKINS L.L.P.**  
2801 Via Fortuna, Suite 100  
Austin, TX 78746  
Telephone: (512) 542-8400  
Facsimile: (512) 542-8612  
Email: hpreston@velaw.com  
Email: eshallman@velaw.com  
Email: mmelancon@velaw.com

Abigail Lubow  
California State Bar No. 314396  
**VINSON & ELKINS L.L.P.**  
555 Mission Street, Suite 2000  
San Francisco, CA 94105  
Telephone: (415) 979-6963  
Facsimile: (415) 358-5770  
Email: alubow@velaw.com

**COUNSEL FOR PLAINTIFFS JAPAN  
DISPLAY INC. and PANASONIC LIQUID  
CRYSTAL DISPLAY CO., LTD.**

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2021, a true and correct copy of the foregoing document was electronically filed in compliance with Local Rule CV-5(a) and was served on all counsel who are deemed to have consented to electronic service, per Local Rule CV-5(a)(3).

/s/ Hilary L. Preston

Hilary L. Preston

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and that this motion is unopposed. The personal conference required by the Rule was conducted by e-mail on February 1 and 2, 2021, between counsel for Plaintiffs (Hilary Preston) and counsel for Defendant (Aidan Skoyles).

/s/ Hilary L. Preston

Hilary L. Preston